

KYH/SES: USAO 2025R00175

U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
2025 JUN 26 PM 3:17

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

DONTE JOHNSON,

Defendant.

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UNDER SEAL

CRIMINAL NO. BAH 25-0189

(Possession of a Firearm and  
Ammunition by a Prohibited Person,  
18 U.S.C. § 922(g)(1); Possession with  
Intent to Distribute Controlled  
Substances, 21 U.S.C. § 841(a)(1);  
Possession of a Firearm in  
Furtherance of a Drug Trafficking  
Crime, 18 U.S.C. § 924 (c); Forfeiture,  
18 U.S.C. § 924(d), 21 U.S.C. § 853, 28  
U.S.C. § 2461(c))

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INDICTMENT

COUNT ONE

(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about February 21, 2025, in the District of Maryland, the Defendant,

**DONTE JOHNSON,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms and ammunition, to wit: (1) one Mossberg model 500 20-gauge shotgun bearing serial number V0345679; (2) one Smith and Wesson model SD9 VE 9mm Luger pistol bearing serial number FZM9211; (3) one Harrington and Richardson model 733 .32 caliber pistol revolver bearing serial number AJ45479; (4) one Smith and Wesson model SD40 VE .40 caliber pistol bearing serial number FCJ0503; (5) one Star model CO .25 caliber pistol bearing serial number 433940; and approximately one-hundred and fifty (150) rounds of ammunition of assorted calibers, and the firearms and ammunition were in and affecting

commerce.

18 U.S.C. § 922(g)

**COUNT TWO**

**(Possession with Intent to Distribute Controlled Substances)**

The Grand Jury for the District of Maryland further charges that:

On or about February 21, 2025, in the District of Maryland, the Defendant,

**DONTE JOHNSON,**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(C)  
18 U.S.C. § 2

**COUNT THREE**

**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

The Grand Jury for the District of Maryland further charges that:

On or about February 21, 2025, in the District of Maryland, the Defendant,

**DONTE JOHNSON,**

did knowingly possess firearms, that is: (1) one Mossberg model 500 20-gauge shotgun bearing serial number V0345679; (2) one Smith and Wesson model SD9 VE 9mm Luger pistol bearing serial number FZM9211; (3) one Harrington and Richardson model 733 .32 caliber pistol revolver bearing serial number AJ45479; (4) one Smith and Wesson model SD40 VE .40 caliber pistol bearing serial number FCJ0503; and (5) one Star model CO .25 caliber pistol bearing serial number 433940, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841, as alleged in Count Two of this Indictment, which is incorporated herein by reference.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**FORFEITURE**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the Defendant's conviction under Counts One through Three of this Indictment.

**Narcotics Forfeiture**

2. Upon conviction of the offense alleged in Count Two of this Indictment, the Defendant,

**DONTE JOHNSON,**

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

**Firearm and Ammunition Forfeiture**

2. Upon conviction of the offenses alleged in Counts One or Three of this Indictment, the Defendant,

**DONTE JOHNSON,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in such offenses.

**Property Subject to Forfeiture**

3. The property to be forfeited includes, but is not limited to:

- a. a Mossberg model 500 20-gauge shotgun bearing serial number V0345679;

- b. a Smith and Wesson model SD9 VE 9mm Luger pistol bearing serial number FZM9211;
- c. a Harrington and Richardson model 733 .32 caliber pistol revolver bearing serial number AJ45479;
- d. a Smith and Wesson model SD40 VE .40 caliber pistol bearing serial number FCJ0503;
- e. a Star model CO .25 caliber pistol bearing serial number 433940; and
- f. approximately one-hundred and fifty (150) rounds of ammunition of assorted calibers.

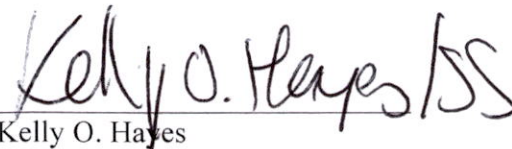
**Substitute Assets**

3. If, as a result of any act or omission of the Defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)

  
Kelly O. Hayes  
United States Attorney

A TRUE BILL:



**SIGNATURE REDACTED**

\_\_\_\_\_  
foreperson

6/26/2025  
Date